

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SCANSOFT, INC.)
Plaintiff,)
v.) Civil Action No. 04-10353 PBS
VOICE SIGNAL TECHNOLOGIES, INC.,)
LAURENCE S. GILLICK, ROBERT S.)
ROTH, JONATHAN P. YAMRON, and)
MANFRED G. GRABHERR)
Defendants.)

)

**PLAINTIFF'S SPECIAL DOCUMENT REQUESTS TO DEFENDANT
VOICE SIGNAL TECHNOLOGIES, INC.**

Pursuant to Fed. R. Civ. P. 34, the Local Rules of the District of Massachusetts, and this Court's Order granting Plaintiff's Motion for Remedies for Violation of Protective Order, ScanSoft, Inc. requests that Voice Signal Technologies, Inc. produce for inspection and copying the documents and things specified below, on or before December 1, 2004.

DEFINITIONS

ScanSoft hereby fully incorporates by reference the definitions included in Plaintiff's First Set of Document Requests to Defendant Voice Signal Technologies, Inc., dated May 26, 2004. Additionally, as used herein, the term "counsel" and "counsel's firm" refers to the law firm of Choate, Hall & Stewart and any and all individuals employed by Choate, Hall & Stewart.

INSTRUCTIONS

ScanSoft hereby fully incorporates by reference the instructions included in Plaintiff's First Set of Document Requests to Defendant Voice Signal Technologies, Inc., dated May 26, 2004

REQUESTS

1. Each and every document relating to the steps taken with respect to the documents ScanSoft produced on August 9, 2004, including, but not limited to, documents concerning the receipt of the documents, where they were placed, how they were stored, who had access to them, what steps were taken to review the documents, who reviewed the documents, whether one or more group of documents was selected from the larger group of documents produced, the reasons for such selection, whether copies of the documents, or of selected groups, were made and for what purpose, who received copies of the documents or of selected groups of documents, who was responsible for compliance with the requirements of the protective order in this case, what steps were taken to comply with the protective order in this case, whether any database or index of the documents produced has been made, what documents were copied and produced to Mr. Cohen, what documents were copied and produced to any other person at Voice Signal, what documents were scanned for electronic reading and copying.

2. Each and every document relating to steps taken in assembling and delivering to Mr. Cohen the highly confidential documents listed in the November 22, 2004 Popeo letter, and/or the steps taken in assembling and delivering to Mr. Cohen any other ScanSoft documents.

3. Each and every document relating to Mr. Cohen's receipt of ScanSoft documents, the person(s) at Voice Signal having access to the documents, what was done with the documents

at Voice Signal, and when and how the documents listed in the November 22, 2004 Popeo letter were returned by Mr. Cohen to counsel.

4. Each and every document relating to communications, whether written or oral letter, e-mail, correspondence, note, memorandum or other document, concerning the treatment of the documents produced by ScanSoft in this litigation.

5. Each and every document relating to the involvement of every person at counsel's firm, Choate, Hall & Stewart, who had any responsibility for the receipt, maintenance, review, culling, copying, analysis, distribution or delivery of all or any portion of the documents produced by ScanSoft and listed in the November 22, 2004 Popeo letter.

6. Each and every document relating to communications whether written or oral, letter, correspondence, e-mail, memorandum, note, or other document authored, drafted, created or produced by counsel or by Mr. Cohen or by anyone else at Voice Signal, which in any way discusses or relates to the content of the highly confidential documents identified in the November 22, 2004 Popeo letter or marked highly confidential or marked confidential or otherwise.

Dated: November 24, 2004

SCANSOFT, INC.,

By its attorneys,

/s/ Lisa M. Fleming
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